

EXHIBIT 4

Excerpted

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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H. CHRISTINA CHEN-OSTER, :
SHANNA ORLICH; ALLISON GAMBA; : NO. 10-cv-6950-AT-RWL
and MARY DE LUI :
Plaintiffs, :
vs. :
GOLDMAN SACHS & CO. and THE :
GOLDMAN SACHS GROUP, INC., :
Defendants. :

X-----X

ATTORNEYS' EYES ONLY - CONFIDENTIAL

CIVIL ACTION VIDEOTAPED DEPOSITION OF: ERIKA IRISH BROWN

C O M P U T E R I Z E D T R A N S C R I P T
of the stenographic notes of the proceedings in the
above-entitled matter as taken by and before Rosalie A.
Kramm, Certified Shorthand Reporter No. 5469, Certified
Realtime Reporter, taken remotely on November 13, 2020,
commencing at 10:06 a.m.

Job No. 4335629

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1 A P P E A R A N C E S:

2

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22 DAVID HALVORSON - Videographer

23

24

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Erika Irish Brown	
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1	A. No.	14:08:30
2	Q. Do you know whether a presentation was made to	14:08:39
3	the board of directors on diversity in 2018?	14:08:42
4	A. So I am not under impression -- under the	14:08:50
5	impression that there was a presentation, a stand-alone	14:08:55
6	diversity presentation to the board in 2018. But I -- I	14:09:00
7	wasn't -- I was not here for a board presentation in	14:09:07
8	2018.	14:09:10
9	Q. Do you know whether there was a presentation to	14:09:12
10	the -- let me -- stepping back. You said stand-alone.	14:09:14
11	Are you aware of a portion of a presentation to the board	14:09:18
12	in 2018 regarding diversity?	14:09:21
13	A. No, I wasn't trying to be tricky with my words.	14:09:24
14	I'm just saying I don't -- I am not aware of a diversity	14:09:29
15	presentation to the board in 2018, but anytime I'm	14:09:31
16	speaking about a period of time that I wasn't at the	14:09:34
17	firm, it -- it doesn't give me comfort, right, because	14:09:36
18	I'm speculating.	14:09:41
19	Q. Understood. You were there the second half of	14:09:43
20	2018.	14:09:45
21	Do you know whether there was a presentation to	14:09:47
22	the board on diversity in 2019?	14:09:49
23	A. Yes, there was.	14:09:52
24	Q. Do you know what month it occurred?	14:09:53
25	A. In June.	14:09:55

1 Q. Did you contribute to the presentation in any 14:09:59
2 way? 14:10:00
3 A. Uh-huh. 14:10:02
4 Q. How so? 14:10:03
5 A. I helped give information on the work that we 14:10:05
6 were doing. 14:10:11
7 Q. Did you create a slide deck? 14:10:11
8 A. There was a slide deck created. I did not 14:10:15
9 personally create it, no. 14:10:17
10 Q. Were you present -- were you present for the 14:10:20
11 presentation? 14:10:23
12 A. I was not. 14:10:24
13 Q. Do you know who would have access to the slide 14:10:29
14 deck? 14:10:30
15 A. I'm sure -- yeah, I mean I -- I think, you 14:10:39
16 know, it would be -- the head of HR's chief of staff at 14:10:42
17 the time was the person that, like, held the pen, so to 14:10:54
18 speak. 14:10:58
19 Q. Who was that? 14:10:59
20 A. Shekhinah Bass. 14:11:01
21 Q. Does Ms. Bass still work at Goldman Sachs? 14:11:03
22 A. She's on parental leave right now, but, yes. 14:11:06
23 Q. Who else would have access to that 14:11:10
24 presentation? Would it be in your files? 14:11:11
25 A. Yeah. I -- I could definitely find it. 14:11:15

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1 Q. Who gave the presentation to the board? 14:11:18
2 A. Our CEO. 14:11:23
3 Q. David Solomon? 14:11:27
4 A. Yes. 14:11:28
5 Q. Did you meet with David Solomon to prepare him 14:11:29
6 for the presentation? 14:11:34
7 A. No, I did not. 14:11:36
8 Q. Did you have any conversations with David 14:11:38
9 Solomon about the presentation? 14:11:40
10 A. I don't think we had any direct conversations 14:11:53
11 about that presentation. 14:11:56
12 Q. Did you correspond with him via email about the 14:12:01
13 presentation? 14:12:04
14 A. No. 14:12:06
15 Q. Did you -- do you recall any conversations with 14:12:09
16 David Solomon close in time to the presentation? 14:12:11
17 A. The main -- the main conversations with David 14:12:18
18 occurred with the head of HR. 14:12:22
19 Q. Were you a party to those conversations? 14:12:27
20 A. No. 14:12:29
21 Q. Do you recall meeting with David Solomon at any 14:12:36
22 time in 2019 prior to the June board of directors 14:12:39
23 meeting? 14:12:44
24 A. I -- let's see. I believe I was in one 14:13:12
25 meeting. I -- I -- I really don't recall. 14:13:25

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1 Q. Do you know when that meeting was? 14:13:31
2 A. No, I don't. 14:13:33
3 Q. Do you recall the topic of the meeting? 14:13:35
4 A. I -- I don't. 14:13:40
5 Q. Do you recall whether that meeting was before 14:13:44
6 or after Easter? 14:13:48
7 A. I don't recall, no. 14:13:51
8 Q. Do you recall any phone conversations with 14:13:56
9 David Solomon -- 14:13:58
10 A. No. 14:14:00
11 Q. -- in 2019 prior to the meeting? 14:14:00
12 A. No. 14:14:02
13 Q. Do you recall any conference calls in which 14:14:10
14 both you and David Solomon participated prior to the 14:14:12
15 meeting in 2019? 14:14:17
16 A. No. 14:14:20
17 Q. Do you recall any videoconferences with David 14:14:23
18 Solomon prior to the 2019 meeting? 14:14:27
19 A. No. 14:14:32
20 Q. Do you know whether there was a presentation to 14:14:43
21 the board of directors on diversity so far this year in 14:14:45
22 2020? 14:14:49
23 A. Yes. 14:14:50
24 Q. When did that occur? 14:14:52
25 A. In June. 14:14:53

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1 Q. Do you know if there was a slide deck for that 14:15:02
2 presentation? 14:15:05
3 A. Yes. 14:15:06
4 MS. OSTRAGER: Object to the time period on 14:15:08
5 this line of questioning. 14:15:09
6 BY MR. LEVIN-GESUNDHEIT: 14:15:11
7 Q. Were you involved in the preparation of that 14:15:11
8 slide deck? 14:15:13
9 MS. OSTRAGER: Same objection. 14:15:17
10 BY MR. LEVIN-GESUNDHEIT: 14:15:17
11 Q. You can answer. 14:15:18
12 A. Yes. 14:15:19
13 Q. Did you make the presentation to the board? 14:15:23
14 MS. OSTRAGER: Same objection. 14:15:27
15 THE WITNESS: I can't -- 14:15:28
16 BY MR. LEVIN-GESUNDHEIT: 14:15:30
17 Q. You can answer. 14:15:30
18 A. I did not personally make the presentation, no. 14:15:31
19 Q. Were you present either physically or 14:15:35
20 telephonically at the presentation? 14:15:37
21 MS. OSTRAGER: Same objection. 14:15:41
22 THE WITNESS: No. 14:15:43
23 MR. LEVIN-GESUNDHEIT: Counsel, are you 14:15:51
24 objecting to any question about anything that has 14:15:51
25 occurred in 2019 or 2020? 14:15:54

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1 MS. OSTRAGER: Yes. 14:15:56

2 MR. LEVIN-GESUNDHEIT: Okay. Your objection 14:15:58

3 has been noted. I don't think -- I'd ask that you stop 14:15:59

4 making objections. It is on the record. I can recognize 14:16:03

5 that it is there. 14:16:05

6 MS. OSTRAGER: I'm going to make objections as 14:16:08

7 I see them to be appropriate objections. But go ahead 14:16:09

8 and ask your questions. 14:16:13

9 MR. LEVIN-GESUNDHEIT: I'm happy to stipulate 14:16:16

10 to a standing objection about any questions that go into 14:16:17

11 2019 or 2020. And I would ask that you please stop the 14:16:20

12 speaking objections. 14:16:25

13 MS. OSTRAGER: These are not speaking 14:16:29

14 objections. 14:16:30

15 BY MR. LEVIN-GESUNDHEIT: 14:16:36

16 Q. Who would have access to the slide deck for the 14:16:37

17 2020 presentation? 14:16:40

18 A. Myself, my team, the head of HR's chief of 14:16:43

19 staff. 14:16:49

20 Q. Who was the head of HR's chief of staff? 14:16:54

21 A. Angelo Tierno. 14:17:01

22 Q. Do you know -- 14:17:06

23 A. Actually, no. I'm sorry. I'm sorry. He -- it 14:17:07

24 was still Shekhinah Bass at the time. 14:17:10

25 Q. Okay. 14:17:13

1	A.	It was still Shekhinah.	14:17:14
2	Q.	Okay.	14:17:16
3	A.	It was prior to her mat. leave. Apologies.	14:17:16
4	Q.	Do you know if the board of directors meetings	14:17:22
5		are recorded?	14:17:24
6	A.	I don't know.	14:17:25
7	Q.	Can you describe the topics presented in the	14:17:34
8		2020 diversity presentation to the board of directors.	14:17:39
9	A.	Sure.	14:17:46
10	Q.	Okay. Can you please tell me what you recall	14:17:48
11		about what was presented.	14:17:50
12	A.	We shared our progress on aspirational goals.	14:17:53
13		We shared our record diversity data -- results for the	14:17:56
14		2019 MD class. We shared our efforts to foster inclusion	14:18:04
15		and roll out pronouns and things of that nature for the	14:18:12
16		LGBTQ-plus community.	14:18:16
17		What else was in the deck?	14:18:23
18		We shared our -- the framework for our new	14:18:25
19		global people strategy under the leadership and how	14:18:28
20		diversity and inclusion is woven into -- into the core	14:18:33
21		for the forward strategy.	14:18:37
22		We shared our -- that's where we shared our	14:18:41
23		newly proposed aspirational VP representation goals and	14:18:44
24		their -- our desire to also double our hiring from HDCUs	14:18:52
25		and setting a public goal for that, as well as our	14:18:58

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1 aspirations to train all of our managers as coaches and 14:19:02
2 inclusive leaders over the next year, and to be the 14:19:07
3 employer of choice as I defined earlier for the 14:19:14
4 LGBTQ-plus community. 14:19:17

5 Q. Was any presentation made regarding gender pay 14:19:21
6 equity? 14:19:25

7 A. Not as part of that presentation and not as any 14:19:26
8 presentation that I've been involved with. 14:19:29

9 Q. Was any presentation made regarding gender 14:19:34
10 outcomes in 360 review? 14:19:43

11 A. No. Are you speaking about to the board, just 14:19:46
12 so I'm clear? Because -- 14:19:51

13 Q. Yes. 14:19:53

14 A. No. 14:19:54

15 Q. Turning back to the 2019 presentation, do you 14:19:57
16 recall the topics presented with respect to diversity? 14:19:59

17 A. Yes. It was similar in terms of forward 14:20:05
18 strategy. It was similar in terms of the newly created 14:20:12
19 aspirational goals for at that point entry-level hiring, 14:20:16
20 other inclusion efforts. What else was in that deck? 14:20:19

21 And -- and basically the progress that we made, 14:20:33
22 you know. I mean, you know, I -- I appreciate that 14:20:36
23 you're focused -- what you're focused on, right, but for 14:20:39
24 what the progress we have made and what we have rolled 14:20:43
25 out over the last several years, that's the focus of 14:20:45

1 somebody like me. The forward. The vision. The work 14:20:50
2 that is being done. The efficacy of the programs that 14:20:55
3 we've put in place. 14:20:57
4 So that's what we're talking to the board 14:20:59
5 about, and the results that we've -- we've reaped from 14:21:02
6 the work that's been done. 14:21:07
7 Q. Was there any presentation in the 2019 meeting 14:21:10
8 regarding gender pay equity? 14:21:13
9 A. No, not that I'm aware of. 14:21:15
10 Q. Was there any discussion at the 2019 board of 14:21:20
11 directors meeting that you attended? 14:21:25
12 A. I did not attend that meeting. I said that. 14:21:28
13 Q. My apologies. 14:21:31
14 Was there any -- had -- 14:21:32
15 Was there any discussion within the 14:21:36
16 presentation regarding setting aspirational goals 14:21:38
17 specific to divisions? 14:21:43
18 A. Not that I can recall. 14:21:55
19 Q. Was there any discussion of setting 14:21:56
20 aspirational goals specific to revenue versus federation? 14:21:57
21 A. Not that I can recall. 14:22:02
22 MS. OSTRAGER: Objection. Asked and answered. 14:22:04
23 BY MR. LEVIN-GESUNDHEIT: 14:22:06
24 Q. In the 2020 presentation, was there any 14:22:09
25 discussion that you can recall with respect to setting 14:22:12

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1 aspirational goals specific to divisions? 14:22:15

2 A. No. 14:22:21

3 MS. OSTRAGER: Objection. Asked and answered. 14:22:22

4 THE WITNESS: Again, my approach is global and 14:22:24

5 firm-wide. I'm the global head of diversity. 14:22:27

6 BY MR. LEVIN-GESUNDHEIT: 14:22:31

7 Q. Understood. It is non-responsive to the 14:22:32

8 question I asked, but understood. 14:22:35

9 In the 2020 presentation, was there any 14:22:37

10 discussion you can recall with respect to setting 14:22:40

11 aspirational goals specific to the revenue portion of 14:22:43

12 Goldman Sachs? 14:22:47

13 MS. OSTRAGER: Objection. Asked and answered. 14:22:48

14 THE WITNESS: Are you talking about discussion 14:22:51

15 in the meeting that I wasn't in? 14:22:52

16 BY MR. LEVIN-GESUNDHEIT: 14:22:54

17 Q. No. In the presentation. 14:22:55

18 A. In the presentation, no. I've answered that. 14:22:57

19 No. 14:22:59

20 Q. Have you had any conversations with David 14:23:01

21 Solomon within your role as Chief Diversity Officer? 14:23:04

22 A. Have I had any conversations with David? 14:23:16

23 Q. Yes. 14:23:19

24 A. Yes, I have had conversations with David. Not 14:23:21

25 many, but any? Yes. 14:23:24

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